

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

HARRY WILLIAMSON,

Plaintiff,

v.

LORAIN COUNTY, *et al.*,

Defendants.

CASE NO. 1:23-cv-01507

JUDGE JAMES GWIN

DECLARATION OF MICHAEL R. BRIACH

I, Michael Briach, declare:

1. I am over 21 years of age, of sound mind, capable of executing this declaration, and have personal knowledge of the facts stated herein, and they are all true and correct.

2. I am one of the attorneys working on behalf of Defendants David Moore, Matt Lundy, Tom Williams, James Cordes, and the Lorain County Board of Commissioners in the above-captioned litigation. I am currently an Associate with the law firm of Dooley, Gembala, McLaughlin & Pecora Co., LPA.

3. I have reviewed the Exhibits attached to Defendants' Motion to Dismiss for Failure to Prosecute in this case.

4. Exhibits B and G attached to Defendants' Motion to Dismiss for Failure to Prosecute are true and accurate copies of text messages that were produced by Plaintiff Harry Williamson in the related state court case captioned *Harry Williamson v. Lorain County, et al.*, Case No. 22CV205156 in the Lorain County Court of Common Pleas.

<p style="text-align: center;">EXHIBIT A</p>
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5. Exhibit F attached to Defendants' Motion to Dismiss for Failure to Prosecute is a true and accurate copy of the email received from Plaintiff's Counsel on April 23, 2024 in this matter.

6. Exhibit H attached to Defendants' Motion to Dismiss for Failure to Prosecute is a true and accurate copy of the email received from Plaintiff's Counsel on April 11, 2024 in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 2nd day of May 2024.

/s/ Michael R. Briach
Michael R. Briach